



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

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AUG 18 2014

Ref: 8EPR-N

Mr. Ron J. Archuleta
Acting Forest Supervisor
U.S. Forest Service
2150 Centre Avenue, Building E
Fort Collins, CO 80526-8119

Re: Middle Bald Mountain Area
Communication Site
Draft Environmental Impact Statement
CEQ # 20140189

Dear Mr. Archuleta:

The U.S. Environmental Protection Agency Region 8 has reviewed the U.S. Forest Service (USFS) Draft Environmental Impact Statement (EIS) for the Middle Bald Mountain Area Communication Site. Our comments are provided for your consideration pursuant to our responsibilities and authority under Section 102(2)(C) of the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. It is the EPA's responsibility to provide an independent review and evaluation of the potential environmental impacts of this project, which includes a rating of the environmental impact of the proposed action and the adequacy of the NEPA document.

Based on the EPA's procedures for evaluating potential environmental impacts on proposed actions and the adequacy of the information present, the EPA is rating the Agency Preferred Alternative an "LO" (Lack of Objections). A full description of the EPA's rating system can be found at www.epa.gov/compliance/nepa/comments/ratings.html#adequacy.

Project Description

The USFS proposes building and operating a government-only public safety radio communications facility on Middle Bald Mountain in the Roosevelt National Forest approximately 60 miles northwest of Fort Collins, Colorado. The project would provide expanded and more reliable all weather emergency communications capabilities in north-central Larimer County. Project components include the following: (1) a 70-foot-high 3-legged steel lattice tower; (2) a 192-square-foot equipment building, including a 20-kilowatt backup diesel generator; (3) an approximately 1,700-foot-long and 10-foot-wide access road for heavy construction vehicles; and (4) a 12-mile-long power line.

The Draft EIS analyzes the impacts of two build alternatives – the Middle Bald Mountain site and the Killpecker site, approximately half a mile northwest of the Middle Bald Mountain site – and the No Action Alternative. The Killpecker site is the Environmentally Preferred Alternative and the USFS's Preferred Alternative.

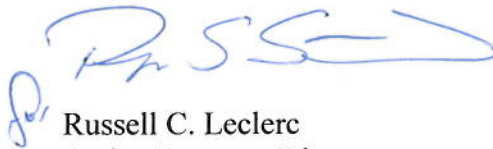
Environmental Issues

The EPA provided scoping comments in a letter dated October 25, 2012. We are pleased that the USFS will be developing a comprehensive Communication Site Management Plan attached to the special use authorization issued to Larimer County that includes a noxious weed management component, that there will be annual certified inspections of the facilities and equipment and that the USFS could conduct periodic reviews to monitor authorization compliance. The EPA believes that the design criteria and construction best management practices detailed in Chapter 2 are sound and protective of the environment.

We understand that there has been outreach through individual letters to the Indian tribes who used to visit the area, but that there has been no response. The EPA recommends documenting this outreach and results in the Final EIS.

Thank you for the opportunity to provide comments on the Middle Bald Mountain Area Communication Site Draft EIS. If you have any questions or would like to discuss our comments, please contact me at 303-312-6704 or the lead reviewer of this project, Carol Anderson, at 303-312-6058.

Sincerely,



Russell C. Leclerc
Acting Program Director
NEPA Compliance and Review Program
Office of Ecosystems Protection and Remediation

cc by email:

Carol Kruse, U.S. Forest Service
Tom Keith, Logan Simpson Design